

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

MEDIX STAFFING SOLUTIONS, INC.,	)	
an Illinois corporation,	)	
Plaintiff,	)	Civil Action No. 3:23-CV-0818-G
	)	
vs.	)	
	)	
STEWARD HEALTH CARE NETWORK,	)	
INC., a Delaware corporation,	)	
and	)	
STEWARD HEALTH CARE SYSTEM LLC, a	)	
Delaware limited liability company,	)	
and	)	
STEWARD HEALTH CARE HOLDINGS	)	
LLC, a Delaware limited liability company,	)	
and	)	
STEWARD MEDICAL GROUP, INC., a	)	
Massachusetts Nonprofit Corporation,	)	
and	)	
STEWARD MEDICAL HOLDINGS LLC, a	)	
Delaware limited liability company,	)	
and	)	
MEDICAL PROPERTIES TRUST, INC., a	)	
Maryland Corporation,	)	
Defendants.	)	

**JOINT STATUS REPORT**

The Parties, including Plaintiff Medix Staffing Solutions, Inc. and Defendants Steward Health Care Network, Inc., Steward Health Care System LLC, Steward Health Care Holdings LLC, Steward Medical Group, Inc., Steward Medical Holdings LLC, and Medical Properties Trust, Inc., respectfully submit this Joint Status Report.

**1. A brief statement of the nature of the case, including the contentions of the parties.**

Plaintiff is a healthcare staffing company. Steward Health Care Network is the physician network for the hospitals under Steward Health Care System. On July 22, 2021, Plaintiff signed a services agreement with Steward Health Care Network. The agreement states that it is “entered

into as of the last date executed by the parties . . . by and between Steward Health Care Network including its subsidiaries, divisions, and affiliates ('Client'), and Medix Staffing Solutions, Inc.” Subsequently, Plaintiff provided staffing services and Steward made payments for certain of those services. On April 19, 2023, when Plaintiff filed suit, a \$564,996.01 principal balance was owed. On April 21, 2023, Steward made two payments, in the amounts of \$214,631.53 and \$74,096.38, totaling \$288,727.91. The current principal balance outstanding is \$276,268.10. Plaintiff has alleged that Defendant Medical Properties Trust, Inc. (“MPT”) is interrelated and jointly-operated with Steward and is also liable to pay for Plaintiff’s services. All Defendants deny these allegations and maintain that MPT has no involvement with Plaintiff or this lawsuit. The parties anticipate a resolution to this case in the near future.

**2. Any challenge to jurisdiction or venue.**

None.

**3. Any pending motions.**

None.

**4. Any matters which require a conference with the court.**

None at this time.

**5. Likelihood that other parties will be joined.**

Other parties are not likely to be joined.

**6. (a) An estimate of the time needed for discovery, with reasons, and (b) a specification of the discovery contemplated.**

Plaintiff believes that six months will be needed for discovery and that the discovery contemplated may be limited in scope to accounting matters and matters involving Defendants’ corporate forms, including written discovery and depositions. Defendants do not believe this discovery is necessary or appropriate, particularly given the nature of this case.

7. **Requested trial date, estimated length of trial, and whether jury has been demanded.**

The parties request a trial date in March 2024.

8. **Whether the parties will consent to trial (jury or non-jury) before a United States Magistrate Judge per 28 U.S.C. § 636(c).**

The parties do not consent to a trial with a United States Magistrate Judge.

9. **Prospects for settlement, and status of any settlement negotiations.**

The parties believe that this matter will be settled in the near future.

10. **What form of alternative dispute resolution (e.g., mediation, arbitration, summary jury trial) would be most appropriate for resolving this case and when it would be most effective (e.g., before discovery, after limited discovery, at the close of discovery).**

The parties believe that this matter will be settled in the near future. Putting this belief aside for the purposes of this question, the parties believe that mediation would be most appropriate for the resolution of this case and a mediation deadline of November 1, 2023 would be appropriate.

11. **Any other matters relevant to the status and disposition of this case.**

None.

Respectfully submitted,

/s/ Kenneth E. Chase

Kenneth E. Chase  
CHASE LAW & ASSOCIATES, P.A.  
1141 71st Street  
Miami Beach, FL 33141  
(305) 402-9800  
(305) 402-2725 (fax)  
kchase@chaselaw.com

James B. Greer  
RANDALL GREER PLLC  
5910 N. Central Expressway, Suite 925  
Dallas, TX 75206  
(214) 628-9966  
(214) 628-9967 (fax)  
jgreer@rglaw.com

*Attorneys for Plaintiff*

/s/ Nicholas S. Graber

Thomas G. Yoxall  
Nicholas S. Graber  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2800  
Dallas, TX 75201  
1900 Duke Street, Suite 210  
Alexandria, VA 22314  
(214) 740-8000  
(214) 740-8800 (fax)  
tyoxall@lockelord.com  
nick.graber@lockelord.com

*Attorneys for Defendants*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on June 6, 2023  
via CM/ECF on all counsel and registered users of record.

By: /s/ Kenneth E. Chase  
Kenneth E. Chase